

The Honorable James L. Robert

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JEREMY FOWLER, individually and on
behalf of others similarly situated,

Plaintiff,

v.

PACIFIC MARITIME ASSOCIATION, and
SSA MARINE, INC., individually and on
behalf of others similarly situated,

Defendants.

No. 2:24-cv-00974-JLR

STIPULATED MOTION FOR
EXTENSION OF TIME FOR
DEFENDANTS TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT

STIPULATION

Plaintiff Jeremy Fowler ("Plaintiff") and Defendants Pacific Maritime Association and SSA Marine, Inc. ("Defendants"), hereby state and stipulate as follows:

1. On May 29, 2024, Plaintiff filed his Complaint in the Washington State Superior Court for King County.
2. By Defendants' Notice of Removal dated July 2, 2024, this action was removed to the United States District Court for the Western District of Washington.
3. Pursuant to Fed. R. Civ. P. 81(c)(2), Defendants' responsive pleading was due July 12, 2024. The parties previously agreed to, and the Court entered, an extension of the Answer deadline to July 23, 2024.
4. Defendants request an extension until August 6, 2024, to answer or otherwise respond to the Complaint.

STIPULATED MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS TO ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT - 1

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5. Plaintiff agrees and stipulates to the extension.

6. Neither party is prejudiced by this extension for Defendants to respond to Plaintiff's Complaint.

WHEREFORE, Defendants respectfully requests that the Court issue an Order granting Defendants until August 6, 2024 to answer or otherwise respond to Plaintiff's Complaint.

Date: July 23, 2024

SCHROETER GOLDMARK & BENDER

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By s/ Lindsay L. Halm

By s/ Joe Wonderly

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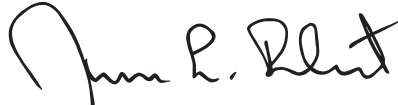
*Attorneys for Defendants Pacific Maritime
Association and SSA Marine, Inc.*

Attorneys for Plaintiff

ORDER

THIS matter came before the Court on the parties' Stipulated Motion for Extension of Time for Defendants Pacific Maritime Association and SSA Marine, Inc. to Answer or Otherwise Respond to Plaintiff's Complaint. The Court, having considered the motion and the record and pleadings herein, hereby ORDERS that Defendants Pacific Maritime Association and SSA Marine, Inc. have until August 6, 2024 to answer or otherwise respond to Plaintiff's Complaint.

DATED this 23rd day of July 2024.



HON. JAMES L. ROBART

Presented by:

SEYFARTH SHAW LLP

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1 *Attorneys for Plaintiff*

2 **CERTIFICATE OF SERVICE**

3 I do hereby certify that I have caused a true and correct copy of the foregoing STIPULATED
4 MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S
5 COMPLAINT to be served upon the following:

6 SCHROETER GOLDMARK & BENDER
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☒ via WDWA ECF
☐ via U.S. Mail
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11 *Attorneys for Plaintiff*

12
13 Dated this 23rd day of July, 2024.

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